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 <b>GENERAL CONTACT REPORT</b>	Date/Time <5/26/98>	Name of Organization Chemical Control Division / Chemical Information & Testing Branch
	Name of EPA Rep. <input type="checkbox"/> Check if Contact Initiator  Laura L. Bunte	Type of Contact  <input checked="" type="checkbox"/> Telephone <input type="checkbox"/> Meeting  <input type="checkbox"/> Other _____
Name of MFG / Org Rep. <input checked="" type="checkbox"/> Check if Contact Initiator  <John Kasper; Nalco Chemical Co.; 630-305-1 454 >		
Topic Covered: Note any resolutions and/or additional Actions Required on this Form.		
<p>&lt;Mr. Kasper called to request that EPA promulgate a de minimis exemption to the 12(b) export notification requirement regulations. He stated that the recent change to one-time per year notices has not helped reduce companies' burden in complying with 12(b) regs. Companies still have to look at all products shipped to see if a shipment is headed for a country for which no notices have been sent to date during the year or containing a chemical for which no notices have been sent to date during the year.</p> <p>I said that he should submit this comment to a 12(b) docket so that the Agency can consider whether an exemption is warranted (or even possible). Companies do not have to test the substances the export in order to determine if a chemical is present in minute amounts. They are responsible for notifying EPA of substances that they are aware they are exporting, however. The strict liability-type standard used for imports does not apply to exports. This comment was not specific to the HAPs test rule, however he said that his questions arose in the context of the HAPs test rule 12(b) proposals.&gt;</p>		
KEY WORDS : <12(b); export notification >		
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